

IN THE UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF WISCONSIN

MADELINE KRASNO,

Plaintiff,

v.

Case No. 21-CV-00099-SLC

BOARD OF REGENTS OF THE UNIVERSITY
OF WISCONSIN, et al.,

Defendants.

DECLARATION OF MADELINE KRASNO

I, Madeline Krasno, declare as follows pursuant to 28 U.S.C. § 1746:

1. I am the Plaintiff in the above-captioned case and make this declaration based on my own personal knowledge.

2. I am a citizen of Oakland, California.

3. I currently work at Farm Sanctuary, a national nonprofit organization that advocates for farmed animals. I am the manager of humane education programs there.

4. In my personal capacity I am also an animal rights advocate.

5. I am an alumna of University of Wisconsin-Madison (the “University”).

6. When I was an undergraduate student at the University, I was interested in a career involving animals so I began working at the University’s Harlow Center for Biological Psychology (“Harlow Center”) as a student primate caretaker (otherwise known as an “animal research technician”). I worked there for about two years, from 2011 to 2013.

7. It was there that I encountered firsthand the conditions of the animals used for experimentation at the University’s Harlow Center. When I worked there, I saw the conditions the primates endured at the University, which I believe were inadequate and inhumane. This

experience was traumatizing but inspired me to educate others about what I believe as the unknown harms of primate testing, specifically the treatment of primates at the University's research centers.

8. I began my activism by highlighting my previous experience in my own social media posts. Later, I began commenting on the University's @uwmadison Instagram account and Facebook page.

9. I have both an Instagram account and a Facebook page. On Instagram, my handle is @madeline_krasno. My Facebook page is under the name Madeline Krasno.

10. In September 2020, before posting on the University's Instagram account or Facebook page, I had already begun speaking publicly about my experience working in the University's primate testing program by posting about my experience on my own Instagram account. On September 17, 2020, I decided it was time to publicly call out the University and tag @uwmadison in my posts that criticized the University's animal testing.

11. On that same day, in mid-September 2020, I noticed that the University was untagging itself in my posts. I understood that an Instagram user can untag themselves when another user tags them in a post, so I would periodically check the University's "Tagged" section on its Instagram page to see if my tagged posts were visible. I immediately noticed that none of my posts tagging the University were there. I would then try and re-tag the University but was unable to do so.

12. On September 18, 2020, I started commenting on the University's social media posts. That day, I commented on the University's Instagram account on a post about dairy cows used for research at its Dairy Cattle Center. I commented: "stop exploiting animals. Get with the future and the future is consistent anti-oppression. Shut down the labs and eat plants!" Within the same post, I also replied to another individual's comment about stopping animal experimentation

and said: “I used to work in one of their labs. I made a bunch of posts and tagged them in it and they hid all of them.” I later learned that the University hid both my comment and reply from public view.

13. I became aware that the University was hiding my comments because I noticed that the public would not “like” or respond to my comments. This was especially noticeable when I would engage in conversation with others by responding to them and tagging them in my response but would never receive a response. So I started taking screen shots of my comments and sending them to friends to check if they could see my comments or replies. My friends then informed me that they were unable to see my comments on the University’s Instagram posts, even though I could see them when viewing from my profile.

14. On September 28, 2020, I commented a second time on a University Instagram post about the opening of a recreation center. I commented: “Thanks for continuing to delete my comments and untag yourself from my photos. Definitely showcases fear. I will continue to share the truth about what it was like working in one of your primate research labs and advocate for their closure. As I mentioned before, today is a great day to shut down the primate research labs!” By the time I posted that comment, I could see on the post that there were already 179 comments. The University hid my comment from public view. Again, I learned that my comment was not visible to others because friends informed me that they were unable to see my comments.

15. By the end of September, *none* of my comments on the University’s Instagram account were publicly visible. For the next four months, I noticed that each comment I made on the University’s Instagram account was hidden from public view.

16. I wrote the following comments on the University’s Instagram account which I learned were hidden from public view:

- a. On October 3, 2020, I commented on a University Instagram post about the birthday of its mascot, Bucky. I commented: “close down the primate labs! @uwmadison.”
- b. On October 29, 2020, I commented on a University Instagram post about University efforts during the COVID-19 pandemic. I commented: “@uwmadison stop testing on monkeys!”
- c. On November 17, 2020, I commented on a University Instagram post about COVID-19 measures. I commented: “Close down the primate labs! @uwmadison.”
- d. On November 23, 2020, I commented on a University’s Instagram post about Thanksgiving travel. I commented: “@uwmadison, close down your primate research labs!”
- e. On December 22, 2020, I commented on a University Instagram post about a dog being treated for cancer at the University’s veterinary hospital. I commented: “It is really quite hypocritical the compassion shown to this dog while thousands of animals languish in laboratories at @uwmadison. I really with you would acknowledge this and do something about it.”

17. I understand through my friends’ Instagram accounts that each of these comments remain hidden today.

18. I have also engaged with the University’s Facebook page to communicate my thoughts and feelings about the University’s animal research program.

19. On December 9, 2020, I commented on a University Facebook post about proud alumni, remarking: “University of Wisconsin-Madison, are you really proud of all of your graduates or just the ones who didn’t object to your barbaric treatment of monkeys in your research labs?” I later learned through another Facebook user that they could not view the comment but my

Facebook friends could, which as I understand how Facebook operates means it was hidden by the University. It is not visible to the public.

20. On December 13, 2020, I commented on a University Facebook post about winter commencement and the future. I commented: “I wish you would think about the future in new ways too and stop testing on monkeys. Working in one of those labs during college showed me how important it is that we create a just world. Animal research is not the way to accomplish this.” Again, I later learned through another Facebook user that they could not view the comment but my Facebook friends could, which as I understand how Facebook operates means the University hid it. Like my first comment on the University’s Facebook page, it is not visible to the public.

21. In the spring of 2021, I learned through public record requests the University responded to, and which were given to me by a friend, that the University maintains a list of keywords that are blocked on the @uwmadison Instagram account and the University’s Facebook page. The keywords contain a list of words and phrases I often use to advocate against animal testing, such as “lab” and “animal testing.” I posted about these keyword filter lists on my Instagram account on April 14, 2021.

22. After learning about the University’s keyword filter lists, I tried to avoid them by modifying the spelling and spacing of certain words in comments I make on the University’s Instagram and Facebook posts. For example, on May 9, 2021, I commented on an Instagram post discussing Mother’s Day: “What about all the mothers you have in cages on campus? Celebrating them too after ripping their babies away from them? A n l m a l t e s t l n g is cruel.” I understand through my friends’ Instagram accounts that this comment was not hidden from view and remains visible.

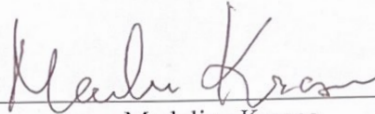
23. Similarly, I commented on a University Facebook post issued March 24, 2022, announcing a “Cool Science Image contest.” I commented: “Considering much of the ‘science’ done at the university is research without consent AKA t e s t l n g o * n a n l m a l s, let’s see some footage the a l n m a l s in your l a b s. After all, y’all are all about transparency right?” I understand through other users’ Facebook pages that this comment was not hidden from view and remains visible.

24. The fact that I have to modify the spelling and spacing of my speech is a burdensome process. I have to try to remember which words are currently on the University’s keyword filter lists to prevent my comments or posts from being hidden. Because I am unable to use plain language to convey my views to others, I believe the effectiveness of my message is diluted.

25. Even though I try to craft messages to avoid the keyword filters, sometimes I forget a particular word or phrase is on the lists and my comment is then hidden from view. On March 11, 2022, I commented on a University Instagram post regarding having a safe and happy spring break. I wrote: “I bet the monkeys and other sentient beings in your labs would like a break or better yet, freedom @UWMadison.” Another user, seth_genteman, replied to my comment stating, “animals may end up saving your life from the research conducted.” From there, seth_genteman and I engaged in a series of replies within the comment thread in which seth_genteman remarked, “[e]veryone would love an easier way to obtain said results,” to which I issued a final reply that referenced my time in the University’s primate “lab,” not remembering at the time that the word is on the University’s Instagram keyword filter list. I later learned through another user’s Instagram account that my final reply to seth_genteman was hidden from view. I can still see seth_genteman’s comments advocating for animal testing, meaning these comments remain visible to the public.

Pursuant to 28 U.S.C. § 1746, I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct.

Dated this 18th day of May 2022.



Madeline Krasno